

CLERK OF COURT  
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2004 SEP 29 P 5:11

IRMA NOEMI RECINOS,  
Plaintiff

v.

SPORTWEAR, INC.  
Defendant.

FILED  
CLERK'S OFFICE  
CIVIL ACTION NO. 04-11134-NG

**ANSWER OF DEFENDANT**

The Defendant Sportswear Store, Inc. hereby answers the numbered paragraphs of the Complaint as follows:

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegation set forth in Paragraph 1 of the Complaint as to the location of the Plaintiff's residence.
2. Defendant's admit the allegations in Paragraph 2 of the Complaint except to the extent that the proper name of the Defendant is Sportswear Store, Inc.
3. Defendant's admit the allegations in Paragraph 3 of the Complaint.
4. Defendant's deny the allegations in Paragraph 4 of the Complaint.
6. Defendant's deny the allegations in Paragraph 6 of the Complaint.
7. The allegations in Paragraph 7 state legal conclusions to which no responsive pleading is required. To the extent they are factual allegations, they are denied.
8. The allegations in Paragraph 8 state legal conclusions to which no responsive pleading is required. To the extent they are factual allegations, they are denied.

**DEFENSES**

FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims are barred under the applicable statute of limitations.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred under the doctrine of laches.

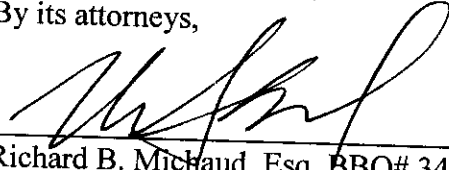
THIRD AFFIRMATIVE DEFENSE

Under the circumstances of the case, the Defendant had no obligation to hire the Plaintiff.

FOURTH AFFIRMATIVE DEFENSE

Defendant reserves the right to supplement its defenses upon further discovery of this case.

Defendant  
SPORTSWEAR STORE, INC.  
By its attorneys,

  
Richard B. Michaud, Esq. BBO# 345000  
Bernkopf Goodman LLP  
125 Summer Street, Suite 1300  
Boston, Massachusetts 02110  
Tel: (617) 790-3000

Dated: September 29, 2004  
#299074 v1/32480/9242

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon each party appearing pro se and the attorney of record for each other party by mail (by hand).

